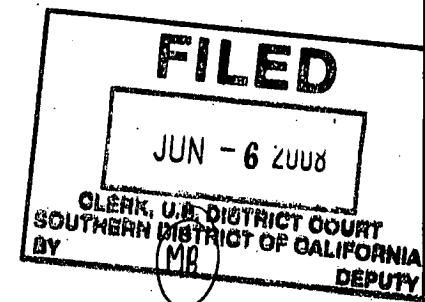


USA



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

Joel HARO-Higuera (1),

Juana RODRIGUEZ-Orozco (2),

Defendants.

} Magistrate Case No.: 08 MJ 8513

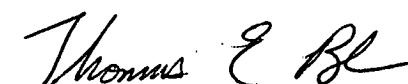
} COMPLAINT FOR VIOLATION OF

} 21 U.S.C. § 952 and 960  
Importation of a Controlled  
Substance (Felony)

The undersigned complainant being duly sworn states:

That on or about June 5, 2008, within the Southern District of California, defendants Joel HARO-Higuera and Juana RODRIGUEZ-Orozco did knowingly and intentionally import approximately 61.22 kilograms (134.68 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
\_\_\_\_\_  
Special Agent  
Immigration & Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 6<sup>TH</sup>

DAY OF JUNE 2008.

  
\_\_\_\_\_  
PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA  
2  
3

v.

4 Joel HARO-Higuera  
5 Juana RODRIGUEZ-Orozco

6 STATEMENT OF FACTS  
7

8 This statement of facts is based on the reports, documents, and notes furnished  
9 to US Immigration and Customs Enforcement Special Agent Behm.  
10

11 On June 5, 2008 at approximately 0553 hours, Joel HARO-Higuera and Juana  
12 RODRIGUEZ-Orozco entered the United States at the Calexico, California, West Port  
13 of Entry. HARO was the driver and RODRIGUEZ the passenger of a 1996 Mercury  
14 Villager. The primary inspector, Customs and Border Protection Officer (CBPO) A.  
15 Ramirez noticed that HARO was avoiding eye contact and not moving at all. CBPO  
16 Ramirez asked RODRIGUEZ her name and she responded "Wal-Mart." HARO gave  
17 the primary inspector a negative oral customs declaration. The vehicle was referred to  
18 the secondary lot for closer examination.

19 In the vehicle secondary lot, CBPO C. Jones preformed a canine inspection of  
20 the vehicle. The canine alerted and responded to the rear seat of the vehicle.  
21

22 A subsequent inspection of the vehicle revealed 60 packages in the doors, rear  
23 seat and quarter panels. Three of the packages were probed by CBPO Jones. One  
24 contained a green leafy substance, which field tested positive for marijuana. One  
25 contained seeds which field tested positive for marijuana. One contained an oily  
substance that field tested positive for marijuana. The marijuana packages had a  
combined weight of approximately 61.22 kilograms (134.68 pounds). The seeds had a  
weight of 2.86 kilograms (6.29 pounds). The hash oil had a weight of 1.14 kilograms  
(2.51 pounds).

26 HARO was placed under arrest and advised of his Constitutional Rights, which  
27 he acknowledged and waived, agreeing to answer questions. HARO admitted  
28  
29

1 knowledge of drugs. HARO stated that RODRIGUEZ was to be paid \$1000.00 and he  
2 was to receive \$2000.00 for smuggling controlled substances into he US.

3 RODRIGUEZ was placed under arrest and advised of her Constitutional Rights,  
4 which she acknowledged and waived, agreeing to answer questions. RODRIGUEZ  
5 admitted knowledge of contraband. RODRIGUEZ stated that she was to be paid 3000  
6 pesos for her involvement.

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